

### **REMARKS**

Claims 1 - 6 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### **REJECTION UNDER 35 U.S.C. § 102**

Claims 1 – 6 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Shimizu et al. (US 2005/0132753 A1) and by Lakra et al. (US 2002/0023946 A1). This rejection is respectfully traversed.

Claim 1 as amended recites a heating unit with a heater for heating a carried member, a belt on at least one roller with part of the belt in contact with the carried member, and an elasticity mechanism for controlling a proximity of the heater to the part of the metal belt in contact with the carried member. A driving controller maintains a constant relative velocity between the carried member and the heating unit and a zero relative velocity between the carried member and the part of the belt in contact with the carried member. Shimizu and Lakra fail to teach or suggest the heating unit and driving controller recited by Claim 1.

The Shimizu reference describes a method for manufacturing optical fiber which includes a heating source used to heat a glass rod. Shimizu, Abstract; paragraph 176. Shimizu fails to disclose a heating unit comprising a belt on at least one roller, an elasticity mechanism, and a driving controller that maintains a constant relative velocity

between a carried member and a heating unit, and a zero relative velocity between a carried member and part of a belt.

The Lakra reference describes a method of an apparatus for heating a substrate whereby a substrate is heated with a flow of directed heated air. Lakra, Abstract. The flow of the heated air is controlled by moving the air heater. Lakra, however, fails to disclose a heating unit comprising a belt on at least one roller, an elasticity mechanism, and a driving controller that maintains a constant relative velocity between a carried member and a heating unit, and a zero relative velocity between a carried member and part of a belt.

Therefore, claim 1 defines over the Shimizu and Lakra references, as discussed above. Reconsideration and withdrawal of the rejection of claim 1 is respectfully requested. With regard to claims 2 through 6, Applicant notes that each either directly or indirectly depends from claim 1, which defines over the references, as discussed above. Therefore, claims 2 through 6 also define over the references, and reconsideration and withdrawal of the rejections are respectfully requested.

#### **REJECTION UNDER 35 U.S.C. § 103**

Claims 1-6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Koopmans (U.S. Pat. No. 6,845,901). This rejection is respectfully traversed.

Claim 1 as amended recites a heating unit with a heater for heating a carried member, a belt on at least one roller with part of the belt in contact with the carried member, and an elasticity mechanism for controlling a proximity of the heater to the part of the metal belt in contact with the carried member. A driving controller maintains a

constant relative velocity between the carried member and the heating unit and a zero relative velocity between the carried member and the part of the belt in contact with the carried member. Koopmans fails to teach or suggest the heating unit and driving controller recited by Claim 1.

The Koopmans heater is stationary above the substrate. Koopmans, 290, Fig. 1B. Thus, Koopmans reference fails to disclose a heating unit comprising a belt on at least one roller with part of the belt in contact with a carried member.

Further, the Koopmans reference is silent as to controlling a proximity of the heater to the part of the belt in contact with the carried member, maintaining a constant relative velocity between the carried member and the heating unit, and maintaining a zero relative velocity between the carried member and the part of the belt in contact with the carried member.

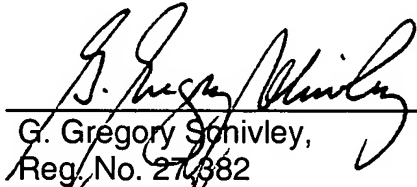
Therefore, claim 1 defines over the Koopmans reference, as discussed above. Reconsideration and withdrawal of the rejection of claim 1 is respectfully requested. With regard to claims 2 through 6, Applicant notes that each either directly or indirectly depends from claim 1, which defines over the reference, as discussed above. Therefore, claims 2 through 6 also define over the reference, and reconsideration and withdrawal of the rejections are respectfully requested.

## CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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